

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Pack Liquidating, LLC, *et al.*,¹

Debtors.

Chapter 11

22-10797 (CTG)

(Jointly Administered)

Official Committee of Unsecured Creditors of
Pack Liquidating, LLC, *et al.*, derivatively, on
behalf of the Debtors' estates,

Plaintiff,

vs.

Adv. No. 23-50536

Kepler Group LLC; and Amazon Advertising
LLC fka Amazon Media Group, LLC,
Defendant.

**JOINT STIPULATION OF THE PARTIES TO EXTEND THE DEADLINES IN THE
PROCEDURES ORDER**

The Official Committee of Unsecured Creditors (the “Committee” or “Plaintiff”) of Pack Liquidating, LLC, *et al.*, derivatively, on behalf of the debtors and debtors-in-possession in the above-captioned bankruptcy proceedings (collectively, the “Debtors”), and Kepler Group LLC and Amazon Advertising LLC fka Amazon Media Group, LLC (the “Defendant” and, together with Plaintiff, the “Parties”), through their respective counsel, enter into this *Joint Stipulation Of The Parties To Extend The Deadlines In The Procedures Order* and hereby stipulate and agree as follows:

1. The Official Committee of Unsecured Creditors of Pack Liquidating, LLC (the “Plaintiff”), filed the above Adversary Proceeding against Kepler Group LLC on September 12, 2023. (Adv. Docket No. 1)

¹ The Debtors in these chapter 11 cases are: Pack Liquidating, LLC; GV Liquidating LLC; PM Liquidating, LLC; PP Liquidating, LLC; PV Liquidating, LLC; and AB Liquidating, LLC.

2. On November 8, 2023, the Court entered “*Order Establishing Streamlined Procedures Governing Adversary Proceedings With Total In Controversy Greater Than \$75,000.00 Brought By Plaintiff Pursuant To Sections 502, 547, 548, 549 And 550 Of The Bankruptcy Code*” (the “Procedures Order”). (Adv. Docket No. 5)
3. On April 12, 2024, the Plaintiff filed an amended complaint adding Amazon Advertising LLC, fka Amazon Media Group, LLC as an additional defendant (the “Amended Complaint”). (Adv. Docket No. 13)
4. Pursuant to Paragraph 4 of the Procedures Order, the Parties are not required to appear at the initial pretrial conference or any subsequently scheduled pretrial conferences.
5. The Parties desire to extend certain deadlines in the Procedures Order.
6. The Parties agree to file an answer or other responsive pleading to the Amended Complaint no later than July 1, 2024.
7. The Parties agree to serve all written interrogatories, document requests and requests for admission, if any, no later than July 30, 2024.
8. The Parties agree that this Adversary Proceeding shall be referred to mediation by the later of (1) August 31, 2024, or (2) if any party has moved to dismiss the Amended Complaint in whole or in part, and such motion does not result in the dismissal of the claims against that party in the Adversary Proceeding, two (2) weeks after the Court’s decision on such motion.
9. The deadline for the Parties to select a mediator from the list of proposed mediators in Exhibit D to the Procedures Order is two (2) weeks after the Adversary Proceeding has been referred to mediation.

10. The deadline for the Parties to complete the mediation is four (4) months after selection of the mediator.
11. The deadline for the Parties to file and serve all dispositive motions, if any, is five (5) months after the completion of mediation.

Dated: June 6, 2024

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Dated: June 6, 2024

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